

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In Re:	)	Chapter 7
	)	
The Neely Group, Inc.	)	No. 24-03859
Debtor.	)	Honorable A. Benjamin Goldgar
	)	

**NOTICE OF MOTION**

TO: See attached list

PLEASE TAKE NOTICE that on July 15, 2024, at 9:30 a.m., I will appear before the Honorable Judge A. Benjamin Goldgar, or any judge sitting in that judge's place, either in courtroom 642 of the Dirksen Courthouse in Chicago ,219 S. Dearborn, Chicago, IL or electronically as described below, and present the Debtor's Motion to Extend the Date for the Debtor to file a Plan and Disclosure Statement and to have the Exclusive Right to File a Plan, a copy of which is attached to this Notice and hereby served upon you.

**Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.**

**To appear by Zoom using the internet**, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode. To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

**Meeting ID and passcode.** The meeting ID for this hearing is Meeting ID: 161 500 0972  
Passcode: 726993. The meeting ID and passcode can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

/s/Keevan D. Morgan

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**CERTIFICATE OF SERVICE**

I, Keevan D. Morgan, an attorney certify an attorney/ that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on this 8<sup>th</sup> Day of July, 2024.

/s/Keevan D. Morgan

**ADDRESS LIST**

By ECF Filing

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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re:	)	Chapter 11
	)	
The Neely Group, Inc.	)	Case No. 24-03859
	)	Honorable A, Benjamin Goldgar
	)	
Debtor.	)	

**MOTION TO EXTEND DEBTOR’S EXCLUSIVE TIME AND TIME TO FILE PLAN**

Now comes the Debtor, The Neely Group, Inc. (the “Debtor”), by and through its attorney, Keevan D. Morgan of Morgan & Bley, Ltd., and moves this Honorable Court to enter an order extending the Debtor’s exclusive period to file a Plan of Reorganization and Disclosure Statement and to file such Plan and Disclosure Statement. In support of its Motion, the Debtor states as follows:

**Jurisdiction**

1. This Court has jurisdiction over this Application under 28 U.S.C. § 157 and 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

**Background**

2. On March 18, 2024, the Debtor filed a Voluntary Petition for Relief (the “Petition Date”) pursuant to Chapter 11 of the Bankruptcy Code. The Debtor is a debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No examiner or statutory committee of creditors has been appointed in this Chapter 11.

3. The Debtor intends to continue remain in possession of its financial affairs pursuant to sections 1107 and 1108 of the Bankruptcy Code and eventually file a Plan of Reorganization with a reasonable chance of confirming it.

### **The Exclusive Period**

4. The Debtor's Exclusive Filing Period expires on July 16, 2024 pursuant to section 1121(d) of the Bankruptcy Code.

5. The Debtor has operated two UPS Store locations and maintains it has at least an agreement to form an agreement with UPS to operate a third store. The Court has ruled that the two existing locations were properly terminated by UPS, but that ruling is under appeal. In any event, in order to deal with the possibility it will lose the appeal, the Debtor is attempting to establish itself as a general delivery service for many carriers such as DHL, USPS, FedEx, as well as UPS, as well as continuing its mailbox services, none of which require a franchise.

6. Additional time is required in order to prepare and finalize a plan of reorganization.

7. By this Motion, the Debtor seeks entry of an order, substantially in the form submitted herewith, (a) extending the Debtor's Exclusive Filing Period by 90 days, until October 14, 2024, without prejudice to the Debtor's right to seek further extensions of the Exclusive Period. This is the Debtor's first request for an extension of the Exclusive Period.

8. The Debtor may seek extension of its exclusive right to file a Plan and to file a Plan, provided that the 180-day period not be extended beyond a date that is 20 months after the petition date. 11 U.S.C. § 1121(d)(1)(2) and commensurately, a Disclosure Statement.

9. The Debtor submits that there is sufficient cause to extend the time to file a Plan and Disclosure Statement and exclusive right to do so because the case is only approaching four months in age and the Debtor is attempting to make a transformation into a broader based company as described above and dealing with its premises landlords as well as the identified appeal.

Wherefore, the Debtor, The Neely Group, Inc. prays this Honorable Court enter an order extending the time in which it must file a Plan and Disclosure Statement and have the exclusive right to file a Plan and Disclosure Statement, and for such other and further relief in its favor as this Court deems just and proper under the circumstances.

**The Neely Group, Inc.**

By: /s/ Keevan D. Morgan  
Its Attorney

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